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Mr. Joe Gowers
U.S Environmental Protection Agency
290 Broadway, 19th Floor New York, New York 10007

RE: National Remedy Review Board Recommendations
Ringwood Mines/ Landfill Superfund Site
Borough of Ringwood, New Jersey

May 17, 2012

Dear Mr. Gowers,

As a member of the social action committee of Temple Shalom of Aberdeen, New Jersey, I have become familiar with the issue of the Ringwood Mines/Landfill Superfund Site. The topic was the focus of our environmental justice programming this spring. I would like to do my part to help achieve justice.

I am seriously troubled about the remediation of the Ringwood Mines/ Landfill Superfund Site, located in the Upper Ringwood, New Jersey. Please accept my stakeholder comments in to the public record and submit them to the United States Environmental Protection Agency (USEPA) National Remedy Review Board (NRRB).

This site is home to New Jersey's Ramapough Mountain Indian community – a unique ancestral Native American Tribe that has lived off the land for hundreds of years, and long before Ford and other responsible parties decided to use our ancestral homes for a dumping ground. The community and tribe have been recognized by the State of New Jersey and our rights to this land cannot be in dispute.

The underprivileged Ramapough Mountain Indian Tribe has suffered premature deaths, rare cancers and autoimmune diseases believed to be linked to toxic waste dumped in our yards decades ago. Though USEPA declared the site clean years earlier, massive mountains of toxic paint sludge still sat out in the open. The chemical wastes that still remain in the targeted three disposal areas are a taking of our lands and rights. There is no deed or sale of this land that shows our original tribal leaders ever sold this land to anyone. In fact, our Ramapough Tribe's land and its leaders are still making a claim for federal recognition that this land and all the land around it is rightfully ours. The NRRB should consider this fact and require Ford and USEPA to fully clean all the land impacted by Ford disposal practices.

The USEPA is now considering seven options for cleanup of mines filled with toxic waste, potentially leaking into groundwater, upstream of the Wanaque Reservoir – a drinking water source for over two million North Jersey residents. The options range from doing nothing, to controversially capping waste in place, to our choice of completely removing the toxic materials.

The tribe has hunted and gathered the local flora and fauna as a cultural way of life, which includes subsistence consumption of flora and fauna and will continue to do so. Complete removal of the waste is the only way to ensure the safety and health of our community's food source. USEPA did an extensive study of biota in the area and determined that related chemicals, including lead, are migrating up the food chain not only in vegetables, such as wild carrots, but in mammals and other organisms as well.

Engineering controls require continuing operations and maintenance forever, and there is no way that their stabilization can be guaranteed. A cap will not prevent burrowing animals, such as groundhogs, from penetrating that cap and bringing contaminated materials to the surface where they would be uncontrolled. Failure to totally remove the wastes will only benefit the responsible parties. The community has accepted the short-term impacts due to truck traffic that will be required for full removal, but it will not accept leaving the wastes in the community forever.

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While the NRRB is not being presented with a groundwater remedy at this time, they must nevertheless consider the connection between the chemicals that have been disposed of in the Peter's Mine Pit, Canon Mine Pit and the O'Connor Disposal Area with the surface water and groundwater. USEPA and Ford have still not have been able to definitively delineate the groundwater. Existing well data indicates some hydraulic connection between the waste disposal areas and groundwater contamination.

There are documented seeps into the surface water of site-related chemicals. Full removal of all wastes from all three disposal areas would protect current and future Wanaque Reservoir drinking water. This complete remediation supports USEPA's Strategic Plan goals for protecting drinking water supplies. Peter's Mine and portions of the O'Connor Disposal Area are in Ringwood State Park, which is owned by the State of New Jersey and its residents. The USEPA does not have permission from the land owners to contain any waste or place or deed restriction in Ringwood State Park. Hundreds of thousands of New Jersey families visit the Ringwood State Park yearly. Anything other than full removal of the waste would amount to the taking of State Parkland, and would require the USEPA to have gotten a New Jersey Green Acres Parkland Diversion with Statehouse approval. The USEPA and Ford do not have any such approval and have withdrawn their application for it after 75,000 people signed a petition against it.

There are no valid reasons why the tribe's children and grandchildren should continue living in fear after seeing entire generations of their relatives die. This is the first site in the history of Superfund to be delisted and then relisted due to the failure of regulatory agencies and elected officials involved, including the NRRB, to carry out a full and effective remediation. Anything short of full removal of all wastes from Peter's Mine Pit, Canon Mine Pit and the O'Connor Disposal Area is an injustice to all the Ramapough Mountain Indian families and community members. Many have become sick and died due to the failures of the USEPA and other federal and state agencies that did not properly remediate this site the first time. Justice will only be served by a full and complete remediation and removal of all waste material from the community.

Respectfully,



Rita Carol



Exemption 6